

To: McQuivey, Cameron[cmcquive@blm.gov]
Cc: James Bradshaw[jbradshaw@blm.gov]; Matthew Betenson[mbetenso@blm.gov]
From: Amstutz, Brian
Sent: 2017-09-06T10:07:58-04:00
Importance: Normal
Subject: Re: IDT Review: DNA 60 for ECAF. Due: Sept 5.
Received: 2017-09-06T10:08:44-04:00
[SRP Map - ECAF v2.pdf](#)
[DNA - SRP ECAF v2.docx](#)
[IDT Checklist - SRP ECAF.docx](#)
[SRP App - ECAF v2.pdf](#)

Hi Cameron,

Attached is the SRP application, SRP map, DNA draft, and IDT checklist. I did not include the draft DR or SRP stipulations.

Thanks for reviewing this. Stay safe.

On Wed, Sep 6, 2017 at 7:45 AM, Matthew Betenson <mbetenso@blm.gov> wrote:

Brian email it to Cameron for review please. Cameron can you look at today if we do that?

Sent from my iPhone

On Sep 5, 2017, at 8:18 PM, McQuivey, Cameron <cmcquive@blm.gov> wrote:

Hi,

I'm currently on a fire assignment. While I can connect through the VPN to get email, I cannot connect to the z drive. Wendy Nay has been working on this but as of yet the problem is unsolved. I cannot access the folders necessary to make this review. Terry Tolbert will have to work on this DNA if he has not already done so.

Cameron

On Tue, Aug 15, 2017 at 4:29 PM, Amstutz, Brian <bamstutz@blm.gov> wrote:

Please review DNA 60 and related project documents, regarding a Special Recreation Permit application from Envision Escalante, doing business as Escalante Canyons Arts Festival. Requested due date is Tuesday, September 5.

Project folder location

(b)(5)

Description of proposed action

The BLM is proposing to issue a multi-year SRP to Escalante Canyons Arts Festival, a new applicant, to conduct art programs, creative demonstrations, educational workshops, day hiking tours, speaker series, musical programs, yoga sessions,

and similar group services. Authorization for Escalante Canyons Arts Festival would begin on January 1, 2017 and extend through December 31, 2021.

Escalante Canyons Arts Festival plans to operate annually for two weeks each September. In 2017, up to 20 events would occur on lands administered by GSENM between September 19 and September 30. Multiple events may occur in separate locations on the same day. Group sizes for each event would vary, consistent with Monument Management Plan zone requirements. No overnight activity or camping is proposed. Events and activities in future years are anticipated to be of similar scope, duration and season of use. Based on projected use, the BLM estimates that Escalante Canyons Arts Festival would generate 546 visitor days annually.

Authorized areas for Escalante Canyons Arts Festival services would include the following:

- Road Corridors: Highway 12 between Boulder and Escalante; the Burr Trail, including the Long Canyon Slot; Hoodoos (BLM Road 105); Spencer Flat; Cedar Wash Road, including Cedar Wash Arch and Covered Wagon Natural Bridge; Smoky Mountain Road; Left Hand Collett Road; Hole-in-the-Rock Road; and Pine Creek Road.
- Hiking Routes: Lower Calf Creek Falls; Cream Cellar route from Head of the Rocks to Highway 12; and the Upper Escalante Gorge
- Destinations: Long Canyon Slot; Calf Creek Recreation Area; Cedar Wash Arch; Covered Wagon Natural Bridge; Devils Garden; Dance Hall Rock; and the Escalante Interagency Visitor Center, including the auditorium and conference room.

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Brian Amstutz
Park Ranger & Special Recreation Permit Administrator
Grand Staircase-Escalante National Monument
435.826.5627

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Cameron McQuivey
Wildlife Biologist
Grand Staircase-Escalante National Monument
(435) 691-4316

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Grand Staircase-Escalante National Monument
435.826.5627

**United States Department of the Interior
Bureau of Land Management**

Determination of NEPA Adequacy

**DOI-BLM-UT-0300-2017-0060-DNA
ECAF
Special Recreation Permit**

Location: Grand Staircase-Escalante National Monument

Applicant/Address: Envision Escalante
dba Escalante Canyons Art Festival
PO Box 40
Escalante, UT 84726

Grand Staircase-Escalante National Monument
669 South Hwy 89A
Kanab, Utah 84741
Phone: 435-644-1200
Fax: 435-644-1250



WORKSHEET DETERMINATION OF NEPA ADEQUACY

U.S. Department of the Interior
Utah Bureau of Land Management

The signed CONCLUSION at the end of this worksheet is part of an interim step in the Bureau of Land Management's (BLM) internal analysis process and does not constitute an appealable decision; however, it constitutes an administrative record to be provided as evidence in protest, appeals and legal procedures.

OFFICE: Grand-Staircase-Escalante National Monument (GSENM)

TRACKING NUMBER: DOI-BLM-UT-0300-2017-0060-DNA

PROPOSED ACTION TITLE/TYPE: ECAF Special Recreation Permit (SRP)

LOCATION/LEGAL DESCRIPTION: Grand Staircase-Escalante National Monument located in Garfield and Kane Counties, Utah

APPLICANT (if any): Envision Escalante, dba Escalante Canyons Arts Festival

A. Description of the Proposed Action and Any Applicable Mitigation Measures

The BLM is proposing to issue a one-time SRP to Envision Escalante, doing business as Escalante Canyons Arts Festival, to conduct educational workshops, art demonstrations, speaking events, and public presentation services. Authorization for Escalante Canyons Arts Festival would begin on September 18, 2017 and extend through September 31, 2017.

Authorized areas for Escalante Canyons Arts Festival services would include the following:

Road corridors: Highway 12 between the towns of Boulder and Escalante; Burr Trail; Spencer Flat; Alvey Wash; and the east side of Pine Creek Road

Hiking areas: Devils Garden; the Escalante River Gorge for up to 3 miles downstream of the Escalante River town trailhead; and the Escalante River Gorge for up to 3 miles upstream of the Escalante River bridge trailhead

Developed facilities: the Escalante Interagency Visitor Center's conference room and auditorium

Escalante Canyons Arts Festival plans to conduct 21 separate events from September 19 through September 30, 2017. Of these, 10 events would occur exclusively in the Escalante Interagency Visitor Center; six would occur along road corridors and hiking areas; and five would occur in both the Escalante Interagency Visitor Center and along road corridors or hiking areas. Eighteen events would occur on a single day, two events would occur over two days, and one event would occur over three days. No camping or overnight activity would occur. Multiple events may occur

in separate locations on the same day. Group sizes for each event would vary, dependent on Monument Management Plan zone restrictions. Based on projected use, the BLM estimates that Escalante Canyons Arts Festival would generate up to 619 visitor days¹.

Escalante Canyons Arts Festival would operate in accordance with established GSENM and BLM Utah stipulations.

B. Land Use Plan (LUP) Conformance

GSENM Monument Management Plan (MMP) Date Approved: February 2000

The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:

- OG-1: Outfitter and guide operations will be allowed throughout the Monument in compliance with the constraints of the zones and other Plan provisions.
- GROUP-3: Appropriate NEPA analysis will be prepared on areas where permits could be authorized.

C. Identify the applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

DOI-BLM-UT-0030-2011-0002-EA Programmatic Environmental Assessment for Issuing Special Recreation Permits within Grand Staircase – Escalante National Monument, completed on October 11, 2012.

DOI-BLM-UT-0030-2011-0002-EA Decision Record for Programmatic Environmental Assessment for Issuing Special Recreation Permits within Grand Staircase – Escalante National Monument, signed October 15, 2012.

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

Yes, this new proposed action is a feature of the proposed action analyzed in the Programmatic Environmental Assessment (EA) for Issuing SRPs within GSENM. The proposed action is to issue SRPs that authorize art programs, creative demonstrations, educational workshops, speaker

¹ A visitor day is a common unit of measure of recreational use among Federal agencies. One visitor day represents an aggregate of 12 visitor hours to a site or area.

series, and associated day hiking services. The Programmatic EA specifically addresses commercial and organized groups providing services for day hikes, backpacking, mountain biking, hunting, bus and auto tours, ATV tours, outdoor educational courses, equestrian uses, photography, vending, fishing, weddings and other permitted uses under the BLM SRP regulations, 43 CFR 2930.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action (or existing proposed action), given current environmental concerns, interests, and resource values?

Yes, the range of alternatives considered in the Programmatic EA is still appropriate. Two alternatives were analyzed – No Action and the Proposed Action. The BLM analyzed the impacts of issuing SRPs based on applicants complying with identified stipulations to protect the environment. Four issues were identified during internal and external scoping: Cultural, Wildlife, Recreation, and Wilderness Study Areas (WSA) (Section 1.7 of the referenced EA). Given current environmental concerns, interests, and resource values, the range of alternatives and identified issues are still appropriate. No new issues have been identified.

3. Is existing analysis adequate in light of any new information or circumstances (such as, rangeland health standards assessment; recent endangered species listings, updated list of BLM sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Yes, the existing analysis is still valid. The proposed action is an activity that has been directly addressed in the Programmatic EA. No new information or circumstances have been identified and existing analysis is adequate.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Yes, the impacts of issuing this SRP were directly addressed in the Programmatic EA. Soil disturbance would involve foot traffic along hiking routes and vehicle traffic along open roads identified on the Monument's Transportation Plan. Direct, indirect, and cumulative effects are addressed in Chapter 4 of the Programmatic EA.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Yes, the public involvement and interagency review conducted as part of the existing Programmatic EA remains adequate. The EA provided a 30-day public review period and covered this type of activity in its analysis. Four comment letters were received containing 16 individual comments.

E. Persons/Agencies/BLM Staff Consulted:

<u>Name</u>	<u>Title</u>	<u>Resource Represented</u>
Brian Amstutz	Special Recreation Permit Administrator	Project Lead
Jabe Beal	Outdoor Recreation Planner	Program Lead

CONCLUSION *(If you found that one or more of these criteria is not met, then you cannot conclude that the NEPA documentation fully covers the proposed action).*

Plan Conformance:

X This proposal conforms to the applicable land use plan.

This proposal does not conform to the applicable land use plan

Determination of NEPA Adequacy:

X Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of the NEPA.

The existing NEPA documentation does not fully cover the proposed action. Additional NEPA documentation is needed if the project is to be further considered.

Decision Documentation:

A new decision will be prepared

X The proposed action is a subset of an existing decision signed on October 15, 2012, therefore no new decision needs to be prepared.

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.

Signature of Project Lead

Date

Signature of NEPA Coordinator

Date

Signature of the Responsible Official

Date

ATTACHMENTS:

Interdisciplinary Team Checklist

Special Recreation Permit Stipulations

INTERDISCIPLINARY TEAM CHECKLIST

Project Title: ECAF Special Recreation Permit
NEPA Log Number: DOI BLM UT 0300 2017 0060 DNA
Project Leader: Brian Amstutz

DETERMINATION OF STAFF: (Choose one of the following abbreviated options for the left column)

NP = not present in the area impacted by the proposed or alternative actions

NI = present, but not affected to a degree that detailed analysis is required

PI = present with potential for impact that needs to be analyzed in detail

NC = (DNAs only) actions and impacts not changed from those disclosed in the existing NEPA documents cited in Section D of the DNA form.

The rationale column may include NI and NP discussions.

***Delete after checklist has been filled out.

- Use the words “**proposed action**” instead of “project, activity, permit, etc.” The words “proposed action” is what is used throughout all the NEPA documents and that consistency needs to be reflected in the IDT checklist too.
- Use the word “**would**” instead of “will, should, or could”, unless it doesn’t make sense. The word “will” is a Decision Record word, the word “would” is a pre-decisional word.
- Consider not using subjective words such as “substantial”, it is best not to use the word ‘significant’ as this word has a specific meaning spelled out in the handbook and is primarily used in the Decision Record.
- When signing your name, use proper punctuation and spacing, i.e. “/s/ A. Hughes” or “/s/ Amber Hughes” NOT “/s/Ahughes”

RESOURCES AND ISSUES CONSIDERED (INCLUDES SUPPLEMENTAL AUTHORITIES APPENDIX 1 H 1790 1)

Determination	Resource	Rationale for Determination*	Signature	Date
NI	Air Quality (Bybee)	The proposed action would result in minimal surface disturbance. Access would remain on existing routes. Any particulates generated would be minimal and non measurable.	/s/ J. Bybee	8/29/17
NP	Areas of Critical Environmental Concern (Beal)	There are no Areas of Critical Environmental Concern designated within Grand Staircase Escalante National Monument.	/s/ J. Beal	8/16/2017
NI	Biological Soil Crusts (Brinkerhoff)	The proposed action would not impact the biological soil crusts.	/s/ R. Brinkerhoff	8/24/17
NP	BLM Natural Areas (Beal)	Devils Rock Garden is an Outstanding Natural Area. Visitation to the site is high, 20,000+ annually. The proposed action is not expect to impact the site. The site has a toilet, picnic area and adequate parking for the activity. No new issues have been identified for proposed use areas.	/s/ J. Beal	8/16/2017

Determination	Resource	Rationale for Determination*	Signature	Date
NI	Cultural Resources (Zweifel)	Arts Festival activities pose no threat to cultural resource sites; all authorized activity locations are existing roads and trails. Use of historic trails such as the Cream Cellar route will only help to raise awareness and appreciation of such historic sites.	/s/ M. Zweifel	9/5/2017
NI	Greenhouse Gas Emissions (Bybee)	The proposed action would not result in increased emissions. Any emissions generated would be minimal and would be non measureable.	/s/ J. Bybee	8/29/17
	Environmental Justice (Hughes)			
NP	Farmlands (Prime or Unique) (Hughes)	Prime farmland is described as farmland with resources available to sustain high levels of production. In Utah, it normally requires irrigation to make prime farmland. In general, prime farmland has a dependable water supply, a favorable temperature and growing season, acceptable levels of acidity or alkalinity, an acceptable content of salt and sodium, and few or no rocks. Unique farmland in Utah is primarily in the form of orchards. Based on these definitions, no prime or unique farmlands exist within the Monument. (see NRCS 1997 Results Cropland Utah accessed at: http://www.nrcs.usda.gov/wps/portal/nrcs/detail/ut/technical/dma/nri/?cid=nrcs141p2_034092 on 2/6/2014.)		
	Fish and Wildlife Excluding USFW Designated Species (Tolbert/McQuivey)			
NC	Floodplains (Bradshaw)	The proposed action would have negligible impacts on floodplains.	/s/ K. Bradshaw	8/17/17
NC	Fuels/Fire Management (Bate)	The proposed action would not affect Fuels/Fire Management	/s/ A. Bate	9/5/2017
	Geology / Mineral Resources/Energy Production (Titus)			
NC	Hydrologic Conditions (Bradshaw)	The proposed action would have negligible impacts on hydrologic conditions.	/s/ K. Bradshaw	8/17/17
NI	Invasive Species/Noxious Weeds (EO 13112) (Brinkerhoff)	The proposed action would not increase the threat or spread of invasive/noxious weeds.	/s/ R. Brinkerhoff	8/24/17
NC	Lands/Access (Foley)	Existing NEPA analysis in DOI BLM UT 0030 2011 0002 EA is adequate for lands and access issues. The standard terms and conditions included with this permits, along with limited scope and duration of activities, would result in no impact on land tenure or access. These types of activities usually have no impact on realty related valid existing rights. With the exception of group size limits, these activities would qualify under casual use regulations if not for the commercial festival aspect. Proponent should take care to obtain permission before crossing adjacent lands not managed by BLM, including other federal, state/local, and private land. Proponent should also coordinate with UDOT, which holds an RS2477 adjudication for most of the Highway 12 corridor; and with Garfield County, which holds an RS2477 adjudication for the Burr Trail route.	/s/ Mark Foley	08/15/2017

Determination	Resource	Rationale for Determination*	Signature	Date
NI	Livestock Grazing (Stewart)	The proposed action is primarily focused in areas that livestock grazing is not authorized or in areas that grazing livestock do not frequent. Therefore, there will be minimal effects on grazing livestock and livestock grazing administration.	/s/ S. Stewart	8/23/2017
NI	Native American Religious Concerns (Zweifel)	Arts Festival activities pose no threat to cultural resource sites; all authorized activity locations are existing roads and trails and any cultural resource sites in these areas are already well known. Visitation under these circumstances to sites such as rock art will only help to raise awareness and appreciation of such sites.	/s/ M. Zweifel	9/5/2017
	Paleontology (Titus)			
NI	Rangeland Health Standards (Stewart)	The proposed action is primarily focused in areas that GSENM visitors regularly frequent and there will be minimal effects on overall Rangeland Health.	/s/ S. Stewart	8/23/17
NI	Recreation (Beal)	The proposed action was analyzed in the SRP Programmatic EA. Group size limits are addressed in the application and the applicant has agreed to work within GSENM zone restrictions. Shuttle services are proposed by the applicant to address displacement of public use. Shuttles would be utilized in the high use areas and areas that do not have infrastructure to accommodate larger numbers of personal vehicles. Appropriate fees would be charged for the Escalante Visitor Center and Calf Creek day use site. SRP stipulations are adequate to reduce resource concerns.	/s/ J. Beal	8/16/2017
	Socio Economics (Hughes)			
NC	Soils (Bradshaw)	The proposed action would have negligible impacts on soils.	/s/ K. Bradshaw	8/17/17
NC	Threatened, Endangered or Candidate Plant Species (Brinkerhoff)	The proposed action was analyzed in the SRP programmatic EA and there has been no additional impacts brought forward since that EA.	/s/ R. Brinkerhoff	8/24/17
	Threatened, Endangered or Candidate Animal Species (Tolbert/McQuivey)			
NP	Wastes (hazardous or solid) (Pierson)	There will be no industrial wastes or toxic substances used or generated in the proposed action.	/s/ B. Pierson	8/24/17
NC	Water Resources/Quality (drinking/surface/ground) (Bradshaw)	The proposed action would have negligible impacts on water resources.	/s/ K. Bradshaw	8/17/17
NI	Wetlands/Riparian Zones (Brinkerhoff)	The proposed action would not impact the wetlands/riparian zones.	/s/ R. Brinkerhoff	8/24/17
NI	Wild and Scenic Rivers (Beal)	Activities within the proposed action would occur within WSR corridors. The activities are the same or similar to other activities analyzed in the Programmatic EA. No new issues have been identified.	/s/ J. Beal	9/5/2017
NI	Wilderness/WSA (Beal)	Activities in the proposed action would occur in WSA managed lands. The activities would not impact or impair the resource area or future wilderness designations. No new issues were identified for the proposed action.	/s/ J. Beal	8/16/2017
NC	Woodland/Forestry (Bate)	The proposed action would not affect Woodland/Forestry resources.	/s/ A. Bate	9/5/2017

Determination	Resource	Rationale for Determination*	Signature	Date
NI	Vegetation Excluding USFWS Designated Species (Brinkerhoff)	The proposed action would not impact the overall health of the existing vegetation.	/s/ R. Brinkerhoff	8/24/17
NI	Visual Resources (Angus)	The activities proposed would have a temporary impact on visual resources, however they would be created by the presence of people along a road or in a recreational area. The activities will not change the character of the landscape other than people being on the landscape. There are not temporary or permanent structures proposed.	/s/ J. Beal	9/5/2017
NP	Wild Horses and Burros (Stewart)	There are no Wild Horse and Burro Herd Management Areas within GSENM.	/s/ S. Stewart	8/23/2017
NI	Lands with Wilderness Characteristics (Beal)	The proposed action would occur within LWC inventoried lands. Activities identified would not impact or impair future management of LWC inventoried lands.	/s/ J. Beal	8/16/2017

FINAL REVIEW

Reviewer Title	Signature	Date	Comments
Environmental Coordinator			
Authorized Officer			